

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

ePLUS, INC.,	)	
	)	
	)	Civil Action No. 3:09-cv-620
Plaintiff,	)	
	)	
v.	)	
	)	
LAWSON SOFTWARE, INC.	)	
	)	
	)	
Defendant.	)	

**DEFENDANT LAWSON SOFTWARE, INC.'S BRIEF IN SUPPORT  
OF ITS DEFENDANT LAWSON SOFTWARE, INC.'S  
MOTION TO FOR EXPEDITED BRIEFING ON ITS  
MOTION COMPEL PLAINTIFF'S TOTAL REVENUES FROM  
SALES OF PROCURE+, CONTENT+ AND RELATED SERVICES**

Defendant Lawson Software, Inc. ("Lawson") hereby moves for an expedited briefing schedule regarding its Motion to Compel Plaintiff's Total Revenues from Sales of Procure+, Content+, and Related Services.

Lawson requests that this motion be addressed on an expedited schedule given the importance of the information Lawson seeks to use at the evidentiary hearing related to ePlus's injunction request on March 3, 2011. In support of its injunction request ePlus is arguing that the sale of its Content+ and Procure+ products, which ePlus alleges embody the patents in suit, supports its irreparable harm position. To underscore the importance of these products, ePlus has argued that the divisions that sell the products have generated more than \$50 million over the past ten years. While ePlus acknowledges that these divisions also sell other products, ePlus has failed and refused to disclose the underlying sales revenues data for the Content+ and Procure+ products, thus preventing Lawson from breaking down and challenging ePlus's reliance on the

inflated sales revenues. Accordingly, Lawson should be provided with the underlying sales revenue data for the Content+ and Procure+ products, as Lawson has requested, or ePlus should be precluded from relying on any sales data relating to these products.

So that this matter can be briefed and decided sufficiently before the March 3, 2011, to allow Lawson to receive and review the information it seeks from ePlus, Lawson respectfully requests that the Court enter an Order giving ePlus until the close of business on February 24, 2011, to respond to Lawson's Motion to Compel, giving Lawson until noon on February 25, 2011, to file a reply (if any), and setting this matter for hearing during the afternoon of February 25, 2011.

LAWSON SOFTWARE, INC.

By /s/ Robert A. Angle  
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**CERTIFICATE OF SERVICE**

I certify that on this 23rd day of February, 2011, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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